

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
AMENDMENT OF PART 97 OF THE)	WT Docket No. 05-235
COMMISSION'S RULES TO)	RM-10867, <i>et al.</i>
IMPLEMENT WRC-03 REGULATION)	
APPLICABLE TO REQUIREMENTS)	
FOR OPERATOR LICENSES IN THE)	
AMATEUR RADIO SERVICE)	
)	

REPLY TO COMMENTS OF ARRL,
THE NATIONAL ASSOCIATION FOR AMATEUR RADIO

To: The Commission

I. Introduction and Background

1. ARRL, in its comments on this matter, presents two general arguments.

First, that there is an urgent need for an “entry-level” license class which would offer some HF operating privileges to new licensees.

Second, that the Element 1 Morse code examination should remain a requirement for granting an Amateur Extra license.

2. I agree with the **first** ARRL argument, and my comments **will present an interim solution** that the Commission could implement with almost no administrative effort or cost.

3. I do not support the **second** ARRL argument, and will not comment further on it in these reply comments.

II. The Entry Level License Class Evolution

4. The **Novice class license**, first implemented in the early 1950's, was arguably the most successful initiative in Commission history for introducing new licensees to the Amateur Radio service. It provided a small sampling of HF and VHF operating privileges to newcomers with only an elementary written examination and a slow-speed Morse examination. For several decades it was the entry-point-of-choice for

new licensees, and provided them with a representative sampling of both HF and VHF operating experiences.

5. In 1991 the Commission introduced the **codeless Technician** license, not as a replacement entry-level license, but in recognition that there was no international requirement for a Morse examination for operators not licensed on MF/HF bands. This licence class was also a phenomenal success.

6. It is important to note that holders of the **Technician** license, by successfully completing a 5WPM Morse exam, could also gain access to **the same HF privileges** that were granted to the **Novice** licensees.

7. In May of 2000 the Commission “**restructured**” the number of Amateur Radio license classes from 6 down to 3. In that process, the **Novice entry-level class** was **closed to new applicants**.

8. Since that point, new **Technician** licensees have **continued to be able to gain HF privileges** by passing the 5WPM Morse exam.

III. No HF for new Technician Licensees

9. If implemented as written, WT Docket **05-235** would close **HF access to the current entry-level class** of licensees. Even though the intent of this proceeding is to remove the requirement for the Morse exam for HF privileges, **incongruously it has the effect of removing any possibility of HF privileges** from licensees who previously had a path to those privileges. This situation is viewed by most as **patently unfair** to new entrants into the Amateur Radio service.

IV. A Simple Interim Solution

10. While I agree with ARRL that a new entry-level license class ought to be developed, **there is an easy and obvious interim solution** to this issue.

11. I recommend that as a part of this proceeding the rules be modified to **allow all Technician licensees access to the same HF segments** currently allowed to Novice and “Technician with code” licensees. This solution could be implemented very easily with only **modest editorial changes** to the current rules, and would result in a smooth and **fair** transition from the current privilege structure.

Thank you for your consideration of these reply comments.

Respectfully,

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